

EXHIBIT 11

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR
ADMISSIONS, INC.,

Plaintiffs,

vs.

UNIVERSITY OF NORTH
CAROLINA, et al.,

Defendants.

AMENDED DEPOSITION
OF
STEPHEN FARMER

THIS DEPOSITION CONTAINS HIGHLY CONFIDENTIAL AND
PROPRIETARY INFORMATION AND IS SUBJECT TO A PROTECTIVE
ORDER RESTRICTING PUBLIC DISCLOSURE OF ITS CONTENTS

TAKEN AT THE OFFICES OF:
UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL
222 East Cameron Avenue
110 Bynum Hall
Chapel Hill, NC 27514

06-28-17
8:24 A.M.

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Court Reporter

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1 Supreme Court or from conversations with counsel
2 and other folks on staff, every time we're --
3 we're picking up another trick. We're trying to
4 figure out which one we should do in the moment to
5 try to make sure that we're doing the best
6 possible job. So the short answer to your
7 question is we've not done the things that you ask
8 of us, but we've done many other things that we've
9 done in good faith to comply with our obligations
10 under the law.

11 Q. (Mr. Strawbridge) Does anyone ever
12 advise you not to do that analysis?

13 MR. SCUDDER: Objections to form.

14 A. I don't recall anyone's ever advising me
15 not to do that analysis.

16 MR. STRAWBRIDGE: Want to take a
17 few minute break? Take a short break?

18 MR. SCUDDER: Yeah, sure.

19 (Off record: 4:28 p.m. to 4:41 p.m.)

20 Q. (Mr. Strawbridge) Mr. Farmer, were you
21 involved in the University's assessment of -- in
22 other words, it's a written report about the
23 educational benefits of diversity?

24 A. Yes, I was.

25 Q. And those are the same benefits that we